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### REMARKS

The Office Action dated 18 February 2004 has been reviewed. Applicant thanks the Examiner for allowing claims 3, 4 and 13-18. Claims 1 and 19 have been amended, and claims 2-18 remain as original or as previously presented. Claims 1-19 are pending, of which claims 1, 2, 5-12 and 19 are respectfully submitted for reconsideration by the Examiner.

Claims 1, 2, 5-9 and 19 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,399,836 to de Versterre et al. ("de Versterre"). Claims 10-12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over de Versterre. These rejections are respectfully traversed in view of the above amendments and the following remarks.

Claim 1 recites a combination of features that include at least two closure members each "including a stem extending from a seating member and being movable to a plurality of positions" and include at least two actuators each "including an armature and an electromagnetic coil, a respective stem extending into a respective electromagnetic coil and being coupled to a respective armature." Similarly, claim 19 recites a combination of features that include first and second closure members each "including a stem extending from a seating member" and include first and second actuators each "including an armature and an electromagnetic coil, a respective stem extending into a respective electromagnetic coil and being coupled to a respective armature." Support for these features is provided at, for example, paragraphs 0015 and 0016, of Applicant's originally filed specification, as well as Applicant's Figure 1.

In contrast, de Versterre shows and states (*see* column 2, lines 3-8) that a unitary valve-positioning actuator module has a mounting face that is adapted for removable assembly in register to the mounting face of a valve-body module that has an exposed valve stem. Accordingly, as shown in de Versterre's Figure 2 (*see also* column 3, lines 41-45), the reduced upper end of the stem 31 of the valve member 32 projects upward, above the plane of surface 18, for co-action with module 10. As shown in de Versterre's Figure 4 (*see also* column 4, lines 33-44), actuator module 10 is fully self-contained within housing 50, and includes bore 52 to accommodate electromagnetic drive components having registered abutment at 55 with the projecting end 31 of the valve stem when modules 10-11 are assembled. Whereas in the instant invention the stems of the closure members extend into the electromagnetic coils of the actuators, de Versterre shows dashpot assemblies 65 interposed between actuators and respective closure members.

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Accordingly, Applicant respectfully submits that de Versterre does not teach every element of independent claims 1 and 19.

Moreover, it is respectfully submitted that de Versterre does not suggest, and in fact teaches against, actuators that are contiguously coupled to respective closure members, as recited in Applicant's independent claims 1 and 19.

Claims 2 and 5-12 ultimately depend from claim 1, and recite the same combination of allowable features recited in claim 1, as well as additional features that further distinguish over the prior art.

At least for the above-described reasons, Applicant respectfully requests that all rejections by de Versterre be withdrawn and that claims 1, 2, 5-12 and 19 also be allowed.

Claims 1 and 19, 2, 5, and 8 were also rejected under the doctrine of obviousness-type double patenting as being unpatentable over claims 1, 13, 14, and 16, respectively, of U.S. Patent No. 6,648,019 to Gagnon. These rejections are respectfully traversed view of the above amendments to claims 1 and 19. Specifically, the allegation that Gagnon's recitation of "coupled" does not read on Applicant's recitation of the relationship between the stems of the closure members and the respective electromagnetic coils and armatures of the actuators.

For at least the above-mentioned reasons, it is respectfully submitted that the rejections under 35 U.S.C. § 102(b), under 35 U.S.C. § 103(a), and under the doctrine of obviousness-type double patenting should be withdrawn, and that the application is in condition for allowance.

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### **CONCLUSION**

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite the prosecution.

**EXCEPT** for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account 50-0310. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,  
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